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 MAY 7 1998  
 Office of the Secretary  
 Federal Communications Commission  
 1919 M Street, N.W.  
 Washington, D.C. 20554  
 Before the  
 Federal Communications Commission  
 Washington, D.C. 20554  
 In the Matter of )  
 )

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Biennial Regulatory Review Amendment of )  
 Parts 0, 1, 13, 22, 24, 26, 27, 80, ) WT Docket No. 98 20  
 87, 90, 95, 97, and 101 of the Commission's Rules )  
 to Facilitate the Development and Use of the )  
 Universal Licensing System in the Wireless )  
 Telecommunications Services )  
 Notice of Proposed Rule making WT98 20

My name is Paul J. Graziani. I currently reside at 8324  
 Leatrice Drive, Little Rock, Arkansas 72227 3920. The only  
 Commission granted license I currently hold is an amateur radio  
 service Extra Class operator license and an amateur radio service  
 station license W5ZK. My comments will primarily concern aspects  
 of the NPRM affecting the amateur radio service.

In general, I am in support of efforts to modify or streamline  
 government operations , particularly when the burden of regulations  
 are eliminated or reduced. However, I do have concerns  
 regarding certain aspects of the Universal Licensing System (ULS)  
 as proposed in the NPRM for the amateur radio service.

I would first like to state that I have attempted to enter  
 personal information into the ULS on the Commission's world wide  
 web page. I happen to be totally blind and found it impossible to  
 enter information due to the way the page is constructed. Web  
 pages can be designed in a manner which is easily accessible by a  
 person who is totally blind. I know it is not necessary to  
 remind the Commission of its legal obligations under Title V,  
 sections 501 and 508 of the federal 1973 Rehabilitation Act  
 as amended, particularly with the number of attorneys employed by  
 the Commission.

I would encourage the Commission staff responsible for  
 implementing the proposed ULS to contact the National Federation  
 of The Blind, 1800 Johnson Street, Baltimore, Maryland. The  
 Federation has extensive experience in making computer systems  
 accessible to persons who are blind. In addition, I would  
 encourage the Commission to solicit information from persons who  
 happen to be blind and computer literate or familiar with remote  
 systems and necessary features to make the system accessible to  
 persons who are blind or severely visually impaired. The key test  
 is not whether a person who is sighted thinks the system is

accessible but if a person who is blind finds the system accessible. Consequently, this will require some "beta" testing by persons who are blind to ascertain if the system is truly accessible before it is fully implemented.

Some general features which need to be considered are to provide text based operations as an alternative to heavy graphical presentations, use of generally recognized terminal emulation schemes such as ANSI, VT100, 220, 320 or the avoidance of heavily proprietary emulation schemes for which screen and telecommunication software used by the blind are not designed to operate. Restricting access to text input fields or selection items on menu screens to a mouse or similar electronic pointing device only eliminates access to a person who is blind. Interface design must include the capability to use cursor controls to access all aspects of critical help screens, data input fields and menu selections. What is visually pleasing to a sighted person may or may not be accessible to voice synthesizers or Braille output devices used to give the blind access to the screen. A text description of any graphic only que is also a necessity. These are but a few general suggestions. It is extremely difficult, if not impossible, to give specific criteria when no real knowledge of the details of the proposed ULS computer hardware/software is known.

Another concern I have regarding the ULS and required electronic filing is how will amateur radio licensees who do not have access to computers perform the required filing? Although many public libraries have computer access to the internet and world wide web, the NPRM states that the ULS will not be on the internet. Either the Commission needs to waive the electronic filing requirement for such individuals or allow entities such as the Volunteer Examination Coordinators to file electronically from papers submitted by individuals for amateur radio license renewal or modification .

I am also having difficulty in understanding why individual licenses can be filed directly through the ULS but club, military recreation, or RACES licenses would have to be handled by a private entity as defined under the NPRM. Why cannot the individual trustee listed on the club license file through the ULS just as an individual would for an individual license. If the goal of the Commission is to reduce or streamline procedures through the use of the ULS, the addition of a third party entity between the club licensee and the Commission is adding an additional unnecessary layer. The ULS data base could be designed to accommodate initial applications for club, military recreation, or RACES station licenses in an automated format by means of the proposed form 605.

In conclusion, I support the Commission's attempts in streamlining processes and procedures. I do hope the Commission will be mindful of its obligation to make electronic filing accessible to all applicants if such electronic filings will become a requirement for licensing by the Commission.

Submitted by:

Paul J. Graziani W5ZK

May 4, 1998

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A handwritten signature in cursive script, reading "Paul J. Graziani". The signature is written in dark ink and is positioned below the typed address information.